

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF KRISTOPHER DAVIS IN SUPPORT OF
PLAINTIFF HEADWATER'S OPPOSITION TO DEFENDANTS' MOTION TO
DISMISS FOR LACK OF STANDING AND PLAINTIFF'S CROSS-MOTION FOR
PARTIAL SUMMARY JUDGMENT AS TO DEFENDANTS' STANDING DEFENSE**

I, Kristopher Davis, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ August & Kabat, and counsel of record for Plaintiff Headwater Research LLC in the above-captioned action. I submit this declaration in support of Plaintiff Headwater Research LLC's Motion to Dismiss for Lack of Standing and Plaintiff's Cross-Motion for Partial Summary Judgment as to Defendants' Standing Defense. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as **Exhibit A** is a true and correct copy of the Report and Recommendation on Standing in *Headwater Research LLC v. Samsung Electronics Co. Ltd.*, No. 2:22-cv-00422-JRG-RSP, Dkt. 399 (E.D. Tex. Aug. 2, 2024).

3. Attached as **Exhibit B** is a true and correct copy of the Transcript of Evidentiary Hearing in *Headwater Research LLC v. Samsung Electronics Co. Ltd.*, No. 2:22-cv-00422-JRG-RSP (E.D. Tex. July 25, 2024).

4. Attached as **Exhibit C** is a true and correct copy of the Report and Recommendation on Standing in *Headwater Research LLC v. Samsung Electronics Co. Ltd.*, No. 2:23-cv-00103-JRG-RSP, Dkt. 364 (E.D. Tex. Mar. 31, 2025).

5. Attached as **Exhibit D** is a true and correct copy of the Transcript of Evidentiary Hearing in *Headwater Research LLC v. Samsung Electronics Co. Ltd.*, No. 2:23-cv-00103-JRG-RSP (E.D. Tex. Feb. 20, 2025).

6. Attached as **Exhibit E** is a true and correct copy of the Report and Recommendation on Standing in *Headwater Research LLC v. Verizon Wireless et al.*, No. 2:23-cv-00352-JRG-RSP, Dkt. 292 (E.D. Tex. June 2, 2025).

7. Attached as **Exhibit F** is a true and correct copy of the Assignment Record for the '110 patent.

8. Attached as **Exhibit G** is a true and correct copy of the Assignment Record for the '359 patent.

9. Attached as **Exhibit H** is a true and correct copy of the Assignment Record for the '918 patent.

10. Attached as **Exhibit I** is a true and correct copy of Qualcomm's objections and responses to Samsung's subpoena in Case No. 2:22-cv-00422-JRG-RSP, dated January 23, 2024.

11. Attached as **Exhibit J** is a true and correct copy of Qualcomm's objections and responses to Samsung's subpoena in Case No. 2:23-cv-00103-JRG-RSP, dated February 19, 2024.

12. Attached as **Exhibit K** is a true and correct copy of Verizon's subpoena to Qualcomm in Case No. 2:23-cv-00352-JRG-RSP, dated January 22, 2024.

13. Attached as **Exhibit L** is a true and correct copy of T-Mobile's subpoena to Qualcomm in Case No. 2:23-cv-00379-JRG-RSP, dated September 13, 2024.

14. Attached as **Exhibit M** is a true and correct copy of AT&T's subpoena to Qualcomm Case No. 2:23-cv-00397-JRG-RSP, dated November 20, 2024.

15. Attached as **Exhibit N** is a true and correct copy of ItsOn Presentation dated September 24, 2008 (produced as HW_00014201; HW103-00017315; HW352-00011655; HW379-00021176; HW397-00021176).

16. Attached as **Exhibit O** is a true and correct copy of ItsOn Presentation dated October 23, 2008 (produced as HW_00011237; HW103-00014554; HW352-00008894; HW379-00018212; HW397-00018212).

17. Attached as **Exhibit P** is a true and correct copy of ItsOn Presentation dated January 6, 2009 (produced as HW_00010817; HW103-00014134; HW352-00008474; HW379-00017792; HW397-00017792).

18. Attached as **Exhibit Q** is a true and correct copy of excerpts from the Deposition Transcript of Alireza Raissinia, dated December 15, 2023.

19. Attached as **Exhibit R** is a true and correct copy of excerpts from the Deposition Transcript of Alireza Raissinia, dated January 16, 2025.

20. Attached as **Exhibit S** is a true and correct copy of excerpts from the Deposition Transcript of David Wise, dated January 31, 2025.

21. Attached as **Exhibit T** is a true and correct copy of a Letter from Qualcomm to Dr. Gregory Raleigh, dated April 4, 2022 (produced as HW_00092649; HW352-00099012; HW379-00054301).

22. Attached as **Exhibit U** is a true and correct copy of excerpts from the Opening Report of Samsung's technical expert, Dr. Dan Schonfeld, dated June 4, 2025.

23. Attached as **Exhibit V** is a true and correct copy of U.S. Provisional Application 61/206,354.

24. Attached as **Exhibit W** is a true and correct copy of U.S. Provisional Application 61/348,022.

25. Attached as **Exhibit X** is a true and correct copy of U.S. Provisional Application 61/435,564.

26. Attached as **Exhibit Y** is a true and correct copy of Invention Disclosure, Confidentiality & Proprietary Rights Agreement, signed by Dr. Gregory Raleigh, dated December 18, 2006.

27. Attached as **Exhibit Z** is a true and correct copy of Invention Disclosure, Confidentiality & Proprietary Rights Agreement, signed by Alireza Raissinia, dated December 18, 2006.

28. Attached as **Exhibit AA** is a true and correct copy of Qualcomm employment record of Dr. Gregory Raleigh, dated February 21, 2024.

29. Attached as **Exhibit BB** is a true and correct copy of Qualcomm employment record of Alireza Raissinia, dated December 8, 2006.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 28, 2025, at Los Angeles, California.

/s/ Kristopher Davis
Kristopher Davis